



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 6, 2017

Jessica D. Ramírez, P.E.
Senior Engineer
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1111 Broadway, 6th Floor
Oakland, California 94607

Re: EPA Comments on Risk Management Plan (RMP) Annual Report Form for Parcel UC-1, Hunters Point Naval Shipyard, San Francisco, California, September 2016 and the Risk Management Plan (RMP) Annual Report Form for Parcel UC-2, Hunters Point Naval Shipyard, San Francisco, California, September 2016

Dear Ms. Ramirez:

Attached are EPA's comments on the Risk Management Plan (RMP) Annual Report Form for Parcel UC-1, Hunters Point Naval Shipyard, San Francisco, California, September 2016 and the Risk Management Plan (RMP) Annual Report Form for Parcel UC-2, Hunters Point Naval Shipyard, San Francisco, California, September 2016

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Judy C. Huang".

Judy C. Huang, P.E.
Remedial Project Manager

cc:

Derek J. Robinson, US Navy (via Email)
Nina Bacey, DTSC (via Email)
Tina Low, RWQCB (via Email)
Amy Brownell, SFDPH (via Email)
Danielle Janda, US Navy (via Email)
Randy Brandt, Geosyntec (via Email)

**Review of the Risk Management Plan (RMP) Annual Report Form for Parcel UC-1,
Hunters Point Naval Shipyard, San Francisco, California, September 2016 and the
Risk Management Plan (RMP) Annual Report Form for Parcel UC-2, Hunters
Point Naval Shipyard, San Francisco, California, September 2016**

UC-1 GENERAL COMMENT

1. The Risk Management Plan (RMP) Annual Report Form for Parcel UC-1, Hunters Point Naval Shipyard, San Francisco, California, September 2016 (the UC-1 Annual Rpt) includes several discrepancies. Examples include, but are not limited to, the following:
 - Page C-1 of the UC-1 Annual Rpt lists the inspection time from 2:30 to 5:00 pm, while page 1 of 5 of the Land Owner's Inspection Checklist lists the inspection time from 2:00 to 3:30 pm.
 - Section 2 of the UC-1 Annual Rpt identifies three areas of sediment accumulation, documented in photos 5, 6/7, and 10, but page 3 of 5 of the Land Owner's Inspection Checklist only lists the areas documented in photos 6/7 and 10.
 - Figure 3 notes an area in need of repair for the durable cover documented in photo 2, but Section 2 of the UC-1 Annual Rpt indicates the area in need of repair is documented in photo 3.

Please revise the UC-1 Annual Rpt to resolve the discrepancies.

UC-1 SPECIFIC COMMENTS

1. **Section 1A, Activities Description, Page C-2:** The last item on page C-2 is not checked, but the description column includes a description for this item. Please check the box corresponding to the last item on page C-2.
2. **Section 1B, General Site Management Activities, Page C-4:** Section 1B asks if a SWPPP was prepared, but the checklist indicates that a SWPPP was not prepared due to "the time sensitive nature of the necessary repairs." While it is understood that time sensitive work prevented the preparation of a SWPPP, it is unclear how storm water issues were prevented and managed during the work without a SWPPP. Also, since work was required during the rainy season, it appears that a SWPPP should be prepared for future work. Please expand the discussion of storm water to explain how storm water issues were prevented and managed during the work without a SWPPP and prepare a SWPPP that can be applied to future work.
3. **Section 1B, General Site Management Activities, Page C-5:** The first item on page C-5 is checked "yes," but there is no description information provided in the description column. Please revise the first item on page C-5 to resolve this discrepancy.
4. **Building 606 Sanitary Sewer Repair Attachment, Asphalt Removal, Sewer Repair, and Asphalt Replacement Activities:** The text states that the soil from the excavation

was “placed on plastic sheeting adjacent to the excavation area, but does not discuss how soil was managed (e.g., was the stockpile covered, whether it rained during repair activities, whether runoff was collected and managed, whether the stockpile was enclosed by the temporary fencing put up each night, etc.). Please revise the text to include additional detail regarding the management of the soil stockpile.

UC-2 GENERAL COMMENT

1. The Risk Management Plan (RMP) Annual Report Form for Parcel UC-2, Hunters Point Naval Shipyard, San Francisco, California, September 2016 (the UC-2 Annual Rpt) includes several discrepancies. Examples include, but are not limited to, the following:
 - Page C-1 of the UC-2 Annual Rpt lists the inspection time from 12:00 to 2:30 pm, while page 1 of 5 of the Land Owner’s Inspection Checklist lists the inspection time from 12:30 to 2:00 pm.
 - Section 2 of the UC-2 Annual Rpt identifies three areas in need of durable cover repair, documented in photos 1/2, 3, and 9, but page 1 of 5 of the Land Owner’s Inspection Checklist only lists the areas documented in photos 1/2 and 3.
 - Section 2 of the UC-2 Annual Rpt identifies two areas in need of durable cover repair, documented in photos 8 and 10/11, but page 1 of 5 of the Land Owner’s Inspection Checklist only lists photos 8 and 11. Similarly, page 5 of 5 of the Land Owner’s Inspection Checklist only lists photos 8 and 11.
 - Figure 3 notes an area in need of asphalt repair for the durable cover documented in photo 9, but Section 2 of the UC-2 Annual Rpt indicates this area is concrete (building foundation), not asphalt.

Please revise the UC-1 Annual Rpt to resolve the discrepancies.

UC-2 SPECIFIC COMMENT

Section 1C, Soil Management Activities, Pages C-5 and C-6: Section 1C indicates that “surplus soil generated...was transported to Parcel D-2;” however, it is unclear whether soil contains contaminants and if it was characterized before transport to Parcel D-2. In addition, it is unclear how the soil was transported and how the soil is managed at the Parcel D-2 stockpiles. Please expand the discussion of soil management to indicate whether the surplus soil contains contaminants and if it was characterized before transport to Parcel D-2. Please also revise the discussion to describe how the soil was transported and how the soil is managed at the Parcel D-2.

